

1 **LOREN S. YOUNG, ESQ.**

Nevada Bar No. 7567

2 **LINCOLN, GUSTAFSON & CERCOS, LLP**

ATTORNEYS AT LAW

3 3960 Howard Hughes Parkway, Suite 200

Las Vegas, Nevada 89169

4 Telephone: (702) 257-1997

Facsimile: (702) 257-2203

5 lyoung@lgclawoffice.com

6 Attorneys for Defendant, TARGET FINANCIAL

7
8
9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 TERESA L. EVANS-SAMPLE,

12 Plaintiff,

13 v.

14 EARLY WARNING SERVICES, LLC; JP
MORGAN CHASE BANK, NA;
15 LEXISNEXIS RISK SOLUTIONS; TARGET
FINANCIAL; AND WELLS FARGO BANK,
16 NA,

17 Defendants.

CASE NO: 2:20-cv-00758-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR TARGET
FINANCIAL TO RESPOND TO
PLAINTIFF'S COMPLAINT
(FIRST REQUEST)**

18
19 Defendant Target Financial ("Target"), by and through its counsel, Loren S. Young,
20 Esq. of Lincoln, Gustafson & Cercos, LLP, and Plaintiff, Teresa L. Evans-Sample
21 ("Plaintiff"), by and through her counsel, David H. Krieger, Esq. of Krieger Law Group, LLC
22 and Matthew I. Knepper, Esq. and Miles N. Clark, Esq. of Knepper & Clark, LLC, hereby
23 respectfully submit this stipulation to extend time for Target Financial to respond to Plaintiff's
24 Complaint. This Stipulation is made in accordance with LR IA 6-1, LR IA 6-2 and LR 7-1.
25 This is the first request for extension of time to respond to Plaintiff's Complaint.

26 Plaintiff filed her Complaint on April 27, 2020, and Target Financial was served with
27 the Complaint on May 18, 2020. Accordingly, Target Financial's response to Plaintiff's
28 Complaint is currently due June 8, 2020. Upon Target Financial's request and good cause

1 shown, Plaintiff has agreed to a two (2) week extension for Target Financial to respond to
2 Plaintiff's Complaint.

3 THEREFORE, Defendant Target Financial shall have up to and including June 22,
4 2020 to file a responsive pleading to Plaintiff's Complaint.

5 DATED this 5th day of June, 2020.

DATED this 5th day of June, 2020.

6 **KNEPPER & CLARK, LLC**

LINCOLN, GUSTAFSON & CERCOS, LLP

7 */s/ Miles N. Clark*

/s/ Loren S. Young

8 **MILES N. CLARK, ESQ.**

LOREN S. YOUNG, ESQ.

9 Nevada Bar No. 13848
10 5510 S. Fort Apache Rd., Ste. 30
11 Las Vegas, NV 89148-7700
Attorneys for Plaintiff,
Teresa L. Evans-Sample

Nevada Bar No. 7567
3960 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169-5968
Attorneys for Defendant,
Target Financial

12
13 **IT IS SO ORDERED.**

14 6-10-2020

15 Dated: _____

16 
17 _____
18 UNITED STATES MAGISTRATE JUDGE
19
20
21
22
23
24
25
26
27
28

PROOF OF ELECTRONIC SERVICE

I certify that on this 5th day of June, 2020, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Barbara J. Pederson

Barbara J. Pederson, an employee
of the law offices of

v:\a-e\evans-sample_target\atty notes\drafts\pldgs\20200603_sao_extend_bjp.doc.docx